

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>SECOND AMENDMENT ARMS, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>No. 10-CV-4257</b>
	)	<b>Judge Robert M. Dow, Jr.</b>
<b>CITY OF CHICAGO, et al.,</b>	)	<b>Magistrate Judge Sheila M. Finnegan</b>
	)	
<b>Defendants.</b>	)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO ANSWER OR OTHERWISE PLEAD TO  
PLAINTIFFS' FOURTH AMENDED COMPLAINT**

Defendants City of Chicago (the "City"), Mayor Rahm Emanuel, Superintendent of Police Garry McCarthy, and City Clerk Susana Mendoza (collectively, "Defendants"), by their counsel, Stephen R. Patton, Corporation Counsel of the City of Chicago, hereby respectfully move this Court for an extension of time, to and including December 19, 2014, to answer or otherwise plead to Plaintiffs' Fourth Amended Complaint. In support of their motion, Defendants state as follows:

1. Plaintiffs filed their Fourth Amended Complaint on October 22, 2014. In their eight-count complaint, Plaintiffs challenge various provisions of the City's firearms regulations under the First, Second and Fourteenth Amendments, including a challenge to the City's recently enacted ordinance regulating the location and operation of firearm retail establishments in Chicago.

2. Pursuant to the Court's Order dated October 22, 2014, Defendants have until November 26, 2014, to answer or otherwise plead to Plaintiffs' Fourth Amended Complaint.

3. Defendants respectfully request an extension of time, to and including December 19, 2014, to answer or otherwise plead to Plaintiffs' Fourth Amended Complaint. Additional time is necessary to research and formulate an appropriate response to Plaintiffs' claims, several of which raise constitutional questions of first impression. Moreover, since receiving Plaintiffs' Fourth Amended Complaint, Defendants' counsels have had to devote substantial attention to other matters, including an emergency motion to dismiss in *Fraternal Order of Police v. City of Chicago*, 14 CH 17454 (Circuit Court of Cook County), an oral argument in *Mid-North Association v. City of Chicago*, No. 14 CH 9704 (Circuit Court of Cook County), a response brief in an administrative review proceeding in *Armstrong v. City of Chicago*, No. 14 CH 14668 (Circuit Court of Cook County), responsive pleadings in *Friends of the Parks v. Chicago Park District*, No. 14 C-9096 (N.D. Illinois), *Illinois Transportation Trade Association v. City of Chicago*, No. 14 C-827 (N.D. Illinois), and *Right Field Properties, LLC, et al. v. Commission on Chicago Landmarks*, No. 14 C-7100 (N.D. Illinois), and taking and defending several depositions in *LMP Services, Inc. v. City of Chicago*, No. 12 CH 41235 (Circuit Court of Cook County).

4. This is Defendants' first request for an extension of time to answer or otherwise plead to Plaintiffs' Fourth Amended Complaint.

5. Defendants' counsel spoke with Plaintiffs' counsel regarding this motion, and Plaintiffs have no objection to the granting of an extension of time, to and including December 19, 2013, for Defendants to answer or otherwise plead to Plaintiffs' Fourth Amended Complaint.

**WHEREFORE**, for the foregoing reasons, Defendants respectfully request that the Court grant Defendants an extension of time, to and including December 19, 2014, to answer or

otherwise plead to Plaintiffs' Fourth Amended Complaint and grant Defendants such further relief as this Court deems just and appropriate.

Date: November 21, 2014

Respectfully submitted,

STEPHEN R. PATTON,  
Corporation Counsel of the City of Chicago

By: /s/William Macy Aguiar  
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